STATE OF CALIFORNIA—ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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WELL INVESTIGATION PROGRAM—SUPPLEMENTARY SUBSURFACE INVESTIGATION AT 1200 S. FLOWER ST., BURBANK, CA., (FILE NO. 109.0582)

We have received a copy of the letter dated February 7, 1994, submitted to you from ITT Aerospace Control's consultant, Environ, which also transmitted a report entitled "Asbestos, Residue, and Subsurface Sampling Buildings 4, 5, 6, 14, 15, 16, and the Oil Yard" prepared by ICF Kaiser Engineers, as part of the work proposed for the subject site. We have reviewed the submittals and have the following comments which pertain to the scope of work proposed for the soil gas investigation:

1. The procedure for the manual installation of the vapor probes raises concerns regarding ambient air mixing with the soil gas sample once the steel rod is extracted and the teflon lined copper rod is inserted back into the hole. We recommend that the actual sampling rod/sampling point penetrate at least 2 feet deeper than the initial hole.

2. A site specific purge volume vs. contaminant concentration test, where VOC levels are expected to be highest, for major lithologic units or when significant pressure change is encountered, is recommended to be conducted in order to determine the optimal purge volume. The purge rate and time should be adjusted accordingly to achieve optimal purge volume.

3. An on-site three point calibration is recommended to be performed for all compounds in the 8260 list at the beginning of the project. A minimum of three concentrations is required, while the lowest one must not be higher than three times the Method Detection Limit (0.1-1 μg/L).

4. We recommend that a three point and/or mid-point calibration, blank samples, and QC check samples be performed prior to analyzing any soil vapor samples. At the end of each day, a second QC check sample should also be analyzed at a minimum to determine the quality of the system performance.

5. A second column confirmation is recommended for any compounds identified. This qualitative testing can be done at the on-site mobile laboratory or at an off-site fixed laboratory.

6. Nested multi-level discrete zone vapor monitoring probes are recommended to be installed upon the completion of the soil gas survey, in each source area where elevated VOC concentrations exist. These monitoring probes may be installed in association with vapor extraction and/or monitoring wells. However, it is recommended that different sampling tubes be installed, ie., teflon tubing for the soil vapor sample collection and PVC casing for the soil vapor extraction and/or monitoring well.

7. A construction diagram for the multi-level vapor probe installation, including specific details describing installation methods, materials of construction, discrete depths and screen intervals, backfilling, sealing and surface completion of the probes, is recommended to be provided prior to their installation.

8. We recommend that additional soil gas samples and/or multi-level vapor probes within the areas of elevated concentrations in the previously investigated buildings 1, 2, and 3, also be collected and/or installed during this phase of the site assessment activities in order to assist in future remedial planning efforts.

9. We recommend that the soil gas mobile laboratory make available upon request, by Regional Board staff or other regulatory agency, during any site inspection, hard copies of any initial, continued calibration data or other QA/QC data required for analytical testing to support data generated.

10. All QA/QC information and data collected during field sampling and laboratory analyses is recommended to be in a tabular format and submitted in the final report on the enclosed laboratory reporting forms.

11. We recommend that ITT notify this Regional Board before commencing field activities related to the soil gas investigation, so we may schedule a representative to be present.

12. Three copies of the technical report containing the results of the soil gas investigation must be submitted to this Regional Board subsequent to the implementation of proposed activities.

If you have any questions, please contact Ms. Ana Veloz at (213) 266-7590.

GREGG KWEY
Senior Water Resource
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Enclosure.

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